

JacksonLewis

Jackson Lewis P.C.
666 Third Avenue
New York NY 10017-4030
(212) 545-4057 Direct Dial
(212) 972-3213 Fax
Joseph.Anci@jacksonlewis.com

February 5, 2025

VIA ECF

The Hon. Victor Marrero
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: Newkirk v. Douglas Elliman, Inc. et al.
23-CV-07040 (VM)**

Dear Judge Marrero,

This office represents thirty-seven of the named defendants in the above-referenced action (the “DE Defendants”)¹. DE Defendants submit this response to plaintiff’s February 4, 2025 letter request for a second extension of time to submit an amended complaint.

Plaintiff’s request should be denied for failure to comply with Your Honor’s Individual Rule 1(G). Plaintiff has not requested the DE Defendants’ consent or position on this request and has not described any attempt to speak with the DE Defendants about any extension. Further, Plaintiff does not provide a date certain for the extension.

To expedite the matter, DE Defendants do not consent to this extension request for the following reasons. First, the Court’s December 12, 2024 Decision and Order significantly narrowed the issues in this matter and any possible amendment relates to one claim only. Second, the DE Defendants do not consent to an extension of an undefined length.

Should the Court be inclined to grant an extension, the DE Defendants would respectfully request that any extension be limited to one week.

Thank you for your attention to this matter.

Respectfully Submitted,

JACKSON LEWIS P.C.



Joseph Anci, Esq.

cc: All Parties
(via ECF)

¹ This office does not represent defendants Oren Alexander or Tal Alexander.